

### **REMARKS/ARGUMENT**

Claims 1, 4-8, 11-15, and 18-21 are pending in the application upon entry of the present amendment. Claims 2-3, 9-10, and 16-17 are herein canceled. Claims 1, 8, and 15 are herein amended. Claim 1 is amended to incorporate the features previously recited in canceled claim 2. Claim 8 is amended to incorporate the features previously recited in canceled claim 9. Claim 15 is amended to incorporate the features previously recited in canceled claim 16. No new matter is introduced.

The specification as filed is herein amended to correctly identify Figure 5A, referenced at page 11, lines 1-3. In the original specification, the figure was inadvertently identified as Figure 5. No Figure 5 was ever filed, and no new matter is introduced.

#### **Rejections under 35 USC §112**

Claim 3 was rejected under 35 USC §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Claim 3 is herein canceled. Applicants respectfully request that this rejection be withdrawn.

#### **Rejections under 35 USC §102**

Claims 1, 3-8, 10-15 and 17-21 were rejected under 35 USC §102(e) as being anticipated by East et al. (U.S. Patent Application Publication No. US 2003/0061323). The rejections are respectfully traversed, and Applicants request reconsideration.

East et al. teach a management system for thin clients whereby thin clients are organized into a hierarchy with multiple administrative servers in a hierarchy, each managing one or more thin clients. The system includes a master administrative server, one or more lower-level remote administrative servers, and a network of thin clients organized into arbitrary clusters.

In independent claim 1 of the presently claimed invention, as amended herein, Applicants claim a method for administration of a thin client architecture. The method includes providing a plurality of administrators, and distributing a plurality of

administrative tasks among said administrators. The distributing includes dividing said administrative tasks into a plurality of task groups. A first number of said task groups is equal to a second number of said administrators. The method then provides for executing said administrative tasks.

Independent claim 8 of the present invention, as amended herein, recites an administration system for a thin client architecture. The administration system includes a plurality of administrators, and a distribution mechanism configured to distribute a plurality of administrative tasks among said administrators. The distribution mechanism divides said administrative tasks into a plurality of task groups. A first number of said task groups is equal to a second number of said administrators. The administration system then provides a task execution device configured to enable said administrators to execute said administrative tasks.

Finally, in independent claim 15, as amended herein, Applicants claim a computer program product in which a computer usable medium has computer readable program code embodied therein which is configured for administration of a thin client architecture. The computer usable medium includes computer readable code configured to cause a computer to provide a plurality of administrators, and computer readable code configured to cause a computer to distribute a plurality of administrative tasks among said administrators. The distributing includes causing the computer to divide said administrative tasks into a plurality of task groups. A first number of said task groups is equal to a second number of said administrators. The computer usable medium further includes computer readable code configured to cause a computer to enable said administrators to execute said administrative tasks.

In order for a reference to anticipate a claim, *each and every element as set forth in the claim* must be found in the reference, either expressly or inherently described. MPEP 2131. The fact that words or phrases may be common to the reference and a claim is not enough. Each and every element must be found, and each and every element must be found as set forth in the claim. Applicant respectfully submits that East et al. does not anticipate Applicants' independent claims 1, 8, or 15, as amended herein.

Each of Applicants' independent claims 1, 8, and 15, as amended herein, recite that a plurality of administrative tasks are distributed among the administrators, and that the distributing includes dividing the administrative tasks into a plurality of task groups. Further, a first number of the task groups is equal to a second number of the administrators. The patent application publication of East et al. does not teach or suggest this feature, and therefore does not anticipate Applicants' independent claims 1, 8, or 15. It is respectfully pointed out that the Office never asserted that the patent to East et al. disclosed these features. A more complete discussion of the teachings of East et al. and Applicants' claimed task groups is set forth below in reference to the §103 rejection. Claims 4-7, 11-14, and 18-21 are not anticipated by East et al. for at least the same reasons. Applicants therefore respectfully request reconsideration, and that the §102 rejections of claims 1, 4-8, 11-15, and 18-21 be withdrawn.

#### **Rejections under 35 USC §103**

Claims 2, 9, and 15 were rejected under 35 USC §103(a) as being unpatentable over East et al., and further in view of Bahr et al. (U.S. Patent No. 5,109,512). These claim rejections are respectfully traversed, and Applicants request reconsideration in light of claim amendments and the following argument.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art references when combined must teach or suggest all the claim limitations. (MPEP §2143). The mere fact that a reference can be modified does not render the resultant modification obvious unless the prior art also suggest the desirability of the combination. That is, the teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in the applicant's disclosure. Applicants respectfully submit a *prima facie* case of obviousness is not supported against Applicants' claimed invention.

Although claims 2 and 9 have been canceled, Applicants have incorporated the features previously recited in the canceled claims into the independent claims from which

the canceled claims previously depended (claims 1 and 8). Therefore, the following argument is now applicable to Applicants' independent claims 1, 8, and 15, as amended herein.

The Bahr et al. reference teaches an information processing network in which multiple processing devices having individual cache memories and sharing a main storage memory, are organized to enable allocation of a plurality of tasks among the multiple processing devices according to an affinity between task and processing device.

According to the Office, Applicants' claimed feature of a plurality of administrative tasks being distributed among the administrators, and that the distributing includes dividing the administrative tasks into a plurality of task groups with a first number of said task groups being equal to a second number of said administrators, is taught by the combination of East et al. and Bahr et al. Applicants respectfully disagree as follows.

In the cited paragraph [0051] of East et al., the reference recites the following:

The traditional approach to administering updates has been to have one master administrative server that conveys updates to all the thin clients on the network. As noted above, however, many of the thin clients on the network may have limited bandwidth connections (e.g., 28.8k dial-up connections). As a result, it may take the single master a substantial period of time to complete updating all thin clients in a serial fashion. This may be particularly problematic if there are several thousand thin clients on the network with low bandwidth connections. In contrast, by designating **multiple administrative servers** and using a **hierarchy as shown in FIG. 4**, the task of updating thin clients may be distributed. This may advantageously allow the updating to be performed in parallel. For example, once the update information has been conveyed to remote/master administrative server 202B from master administrative server 202A, server 202B may update thin clients 200C-D in parallel with master 202A updating thin clients 200A-B. (*emphasis supplied*)

In the cited paragraph (col. 4, lines 20-40) of Bahr et al., the reference recites the following:

A salient feature of the present invention is that such gains in efficiency are achieved without sacrificing the ability to set higher priorities for relatively important tasks, and without causing or permitting an imbalance of work load among the various processing devices. More particularly, the option to reset processor affinity for **selected tasks**, in combination with reserving **the tasks with general affinity** during the primary scan, ensures that **such tasks** are not subject to excessive delay from the assignment of **lower priority tasks** with specific processor affinity. When **previously reserved and in some cases previously bypassed tasks are assigned** during the secondary scan and without regard to processor specific affinity, the result is a substantially equal distribution of work load among the processors. Thus, in accordance with the present invention, a compromise or balance is achieved among competing objectives of high cache usage, favoring **high priority tasks** and substantially equal distribution of work load among processing devices. (*emphasis supplied*)

Applicants respectfully submit that East et al. teaches groups of *administrators*, and even, perhaps, groups of *clients* that are updated, but *does not* teach or suggest dividing the administrative **tasks** into a plurality of **task groups**. Bahr et al. teaches a method of distribution of tasks among processors, but *does not* teach or suggest **task groups**, and *does not* teach or suggest a first number of said task groups is equal to a second number of said administrators. Specifically, Bahr et al. teach the distribution of individual tasks to processors, achieving a balance of distribution by repeated scanning through individual tasks and processors.

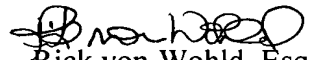
Accordingly, the combination of East et al. and Bahr et al. do not teach or suggest all the claim limitations of Applicants' independent claims 1, 8, and 15, and likewise do not teach or suggest all the claim limitations of Applicants' dependent claims 2 and 9. Applicants therefore respectfully submit that claims 2, 9 and 15 are patentable under 35 USC §103(a) over East et al., and further in view of Bahr et al., and request that these claim rejections be withdrawn.

In view of the foregoing, Applicants respectfully request reconsideration of claims 1, 4-8, 11-15, and 18-21, as amended herein. Applicants submit that all claims are

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in condition for allowance. Accordingly, a notice of allowance is respectfully requested. If Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact the undersigned at (408) 749-6900, ext. 6905. If any additional fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP582). A copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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